

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

MAVERICK RECORDING COMPANY, a) CIVIL ACTION No. 1:06-CV-00582-KAJ
California joint venture; WARNER BROS.)
RECORDS INC., a Delaware corporation;)
PRIORITY RECORDS LLC, a California)
limited liability company; UMG)
RECORDINGS, INC., a Delaware)
corporation; SONY BMG MUSIC)
ENTERTAINMENT, a Delaware general)
partnership; BMG MUSIC, a New York)
general partnership; and ARISTA)
RECORDS LLC, a Delaware limited)
liability company,)
)
Plaintiffs,)
)
vs.)
)
DAVE MICHEL,)
)
)
Defendant.)

**PLAINTIFFS' CONSENT MOTION FOR EXTENSION OF TIME TO FILE RESPONSE
TO DEFENDANT'S COUNTERCLAIM**

Plaintiffs move this Court for a thirty day extension of time to file an answer or motion to dismiss to Defendant's counterclaim. Plaintiffs are currently investigating Defendant's claim that he was not responsible for the alleged copyright infringement. Plaintiffs intend to file a motion to dismiss this counterclaim but would like an additional 30 days to conduct their investigation, prior to doing so, in order to save the Court and the parties the time and expense of briefing and entertaining such a motion, while their investigation is underway. Although Plaintiffs have requested repeated extensions to respond to Defendant's counterclaim requested by Plaintiffs, the parties are very close to a resolution and are very optimistic that a resolution

can be reached in the next 30 days and, therefore, it will be unnecessary to burden the Court with a motion to dismiss. If the case is not resolved by March 15, 2007, Plaintiffs will proceed to file their Motion to Dismiss. This brief extension will not result in any prejudice to any party and will not materially delay this case. Defendant consents to this brief extension.

WHEREFORE, Plaintiffs respectfully request a 30-day extension of time, through March 15, 2007, to file an answer or motion to dismiss Defendant's counterclaim.

DATED: 2/15/07



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Attorneys for Plaintiffs MAVERICK RECORDING COMPANY; WARNER BROS. RECORDS INC.; PRIORITY RECORDS LLC; UMG RECORDINGS, INC.; SONY BMG MUSIC ENTERTAINMENT; BMG MUSIC; and ARISTA RECORDS LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on [insert date], a copy of the foregoing

**PLAINTIFFS' CONSENT MOTION FOR EXTENSION OF TIME TO FILE RESPONSE
TO DEFENDANT'S COUNTERCLAIMS** was served upon the Defendant via United States

Mail as follows:

JOHN ANDRADE
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Attorney for Defendant



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**[PROPOSED] ORDER GRANTING PLAINTIFFS' CONSENT MOTION FOR
EXTENSION OF TIME TO FILE RESPONSE TO DEFENDANT'S COUNTERCLAIM**

This matter comes before the Court on Plaintiffs' Consent Motion to for Extension of Time to File Response to Defendant's Counterclaim. Having reviewed the Motion and being fully advised, the Court FINDS that good cause exists to extend the deadline for Plaintiffs to file their response to Defendant's counterclaim thirty days, through March 15, 2007 and SO ORDERS.

Date: _____	BY THE COURT
	UNITED STATES DISTRICT COURT JUDGE